

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

*This document relates to:*  
Track One-B

MDL 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL ITS EXHIBIT IN  
RESPONSE TO PHARMACY DEFENDANTS' MOTION TO EXTEND  
ALL TRACK 1B DEADLINES BY 60 DAYS**

Pursuant to Northern District of Ohio Local Rule 5.2, Plaintiffs Cuyahoga County and Summit County respectfully seek leave from the Court to submit under seal the exhibit attached to its response to Pharmacy Defendants' Motion to Extend All Track 1B Deadlines by 60 Days.

Plaintiffs respectfully request the option to proceed in this manner so there are no inadvertent disclosures of confidential information subject to CMO No. 2 or the ARCOS Protective Order.

WHEREFORE, Plaintiffs respectfully requests the Honorable Court to grant Plaintiffs' Motion for Leave to file its Exhibit Under Seal.

Dated: March 25, 2020

Respectfully submitted,

/s/Paul J. Hanly, Jr.

Paul J. Hanly, Jr.

SIMMONS HANLY CONROY

112 Madison Avenue, 7<sup>th</sup> Floor

New York, NY 10016

(212) 784-6400

(212) 213-5949 (fax)

phanly@simmonsfirm.com

Joseph F. Rice  
MOTLEY RICE  
28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464  
(843) 216-9000  
(843) 216-9290 (Fax)  
jrice@motleyrice.com

Paul T. Farrell, Jr., Esq.  
FARRELL LAW  
422 Ninth Street, 3<sup>rd</sup> Floor  
Huntington, WV 25701  
(304) 654-8281  
paul@farrell.law

*Plaintiffs' Co-Lead Counsel*

/s/Peter H. Weinberger  
Peter H. Weinberger (0022076)  
SPANGENBERG SHIBLEY & LIBER  
1001 Lakeside Avenue East, Suite 1700  
Cleveland, OH 44114  
(216) 696-3232  
(216) 696-3924 (Fax)  
pweinberger@spanglaw.com

*Plaintiffs' Liaison Counsel*

Hunter J. Shkolnik  
NAPOLI SHKOLNIK  
360 Lexington Ave., 11<sup>th</sup> Floor  
New York, NY 10017  
(212) 397-1000  
(646) 843-7603 (Fax)  
hunter@napolilaw.com

*Counsel for Plaintiff Cuyahoga County, Ohio*

Linda Singer  
MOTLEY RICE LLC  
401 9th St. NW, Suite 1001  
Washington, DC 20004  
(202) 386-9626 x5626  
(202) 386-9622 (Fax)  
lsinger@motleyrice.com

*Counsel for Plaintiff Summit County, Ohio*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 25, 2020, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

/s/Peter H. Weinberger  
Peter H. Weinberger (0022076)  
*Plaintiffs' Liaison Counsel*